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DEPT. OF TRANSPORTATION

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Docket Management
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Dear DOT:

RE: Docket NO. NHTSA-2000-7965 - 4

Notice of Receipt for Decision That Nonconforming 1999-2000 Porsche
911 GT3 Passenger Cars Are Eligible for Importation

Comments by Les Weaver, Wallace Environmental Test Labs (WETL), dated
December 15, 2000

Because there is no identical US vehicle to the GT3 I request that the
petition referenced above be denied. Further, unless WETL is willing to
supply full certification data as required by 49CFR593.6b.

WETL's various comparisons in their response are confusing besides
being unsubstantiated. Throughout the response WETL compares the GT3 to
the 911 but WETL appears to move from one 911 model to another. For
Standard 103 WETL compares the GT3 to the 911 without specifying which
911. For Standard numbers 105 and 135 WETL compares the GT3 to the
2000-1 Twin Turbo 911 sold in the US. And for Standard 301 WETL
compares the GT3 to the 2002 GT2 which I believe is the Turbo GT2 not
the previous GT2, a race car not sold in the US. To the best of my
knowledge, no parts data is yet available for the Turbo GT2. If WETL
has such data they should furnish it to DOT. My data is based on the
Porsche parts database, PET, for both the US and ROW Porsche models.

Standard 103. WETL claims that the defrosting system on the GT3 is as
efficient as the system found on the 911 (which 911?). This comparison
is baseless. The issue is safety not efficiency. In fact the defroster
system of the GT3 and the US 911/996 have numerous differences and the
GT3 defroster includes two blowers part numbers 996 572 903 02 and 996
572 903 01. But the issue is how the defroster is integral to the
overall safety of the vehicle, not how efficient the system is.

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105 and 135. WETL states that the braking system is not identical
without specifying which 911 they are referencing. WETL fails to
specify by part number which brake parts are identical to the
unspecified US 911. WETL appears to be building a unique Porsche with
components from the 911, the 996, the Twin Turbo, the Turbo GT2, etc. to
support their claim that the GT3 is identical to a US model. Once again,
the brake components on the GT3 are part of a manufactured system which
is unique to the overall safety of the GT3. Does WETL have any crash

test data which can compare the overall safety of the GT3 to a specific US model of Porsche?

Standard 106. How does WETL intend to determine the compliance of brake hoses for US standards? Again, the brake hoses are part of a manufactured system which is integral to the overall safety of the GT3. A part number by part number comparison does not, in and of itself, substantiate that the GT3 and an equivalent US model are identical. However, WETL should supply a part by part comparison.

Standard 201. WETL should immediately furnish to DOT the VIN of the Porsche GT3 they state is not equipped with a rollbar. Since the GT is available in Europe as a street car to a full race car WETL should be specific. The GT3 is available as an option delete vehicle so any combination of options would be available. Since Porsche manufactured the WETL comparison vehicle they could best determine the suitability of this specific vehicle to the comparisons that WETL has or will make.

Standard 208. There is in fact more than one airbag unit available for the GT3 and the US 911/996 although not the same airbags. The part number given by WETL, 996 803 089 02, is an airbag unit for a 1999 US 911/996 with the M436 option. While this part number is the standard airbag unit for the GT3 it is not associated with the corresponding US version 911/996 option code again necessitating the question of how WETL would insure FMVSS system compliance. None of the other optional airbag numbers for the driver's side airbag correspond to equivalent US versions.

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214 and Part 581 WETL's intentions as to how they will make the ride height of the GT3 equivalent to the 911/996 are ambiguous and vague and are not supported by any part comparisons. The statement by WETL that they will change suspension related parts without crash testing the vehicle is unacceptable. Simply complying with the FMVSS standard by changing the height to the approved standard would be an egregious violation of FMVSS and would make the GT3 wholly unsafe. Again, WETL has failed to specify how they would meet this standard.

Standard 301. What documentation does WETL possess to prove that the 2002 Turbo GT2 gas tank is equivalent to the GT3? Does WETL intend to submit crash test data showing that the GT3 gas tank passes the standard in the same manner as the Turbo GT2?

In closing, I believe that the petition by WETL for approval of the GT3 should be denied. WETL's comparison to an equivalent US vehicle is non-existent. WETL would have the DOT and the public believe that the GT3 would be made to comply with WETL's 911/996/Twin Turbo/Turbo GT2 version, a version which does not exist. Additionally, WETL has failed to state how they will dispose of the removed GT3 components. Without crash test data to prove that the changes WETL will make are in compliance with FMVSS there is no basis for DOT or EPA to approve the GT3 for US streets. I am also concerned that the GT3 WETL is using for comparison purposes is a Club Sport model and not the same street GT3 sold in Europe. If DOT were to approve WETL's petition what guarantees would be made that GT3 race cars such as the Club Sport would not find their way to street

legal status?

The most erroneous methodology employed by WETL to prove their case for certification of the GT3 is WETLs continued use of part number equivalency to prove compliance with FMVSS. Simply stating that if part numbers of the US version are the same as those used on the GT3 and that changing such parts makes the GT3 comply constitutes a serious error on the part of WETL and DOT, should DOT approve WETL's flawed logic. The GT3 was built as a complete system of parts, each a part of the whole but not necessarily compliant to FMVSS as a stand alone part. Porsche engineered the car as an integrated unit. For WETL to say that they can in any way alter the GT3 or improve on the impeccable engineering of Porsche by simply changing a number of parts is at best, laughable; at the worst, allowing such a petition to be approved could endanger the driver of such a vehicle as well as the motoring public.

In the event that DOT should approve the petition I request certain restrictions apply to the approved petition including a complete build sheet listing all parts which are replaced or modified for compliance for each GT3 approved; complete parts invoices for each approved GT3 such invoices including a list of all parts purchased for replacement; and that all parts which are replaced or removed will be returned to DOT and EPA or destroyed. In addition, I request that each approved GT3 contain documentation from EPA to DOT that the individual GT3 vehicle complies with all EPA requirements.

Very truly yours,

NAME WITHHELD UPON REQUEST